

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

UNITED STATES OF AMERICA

v.

CHASWAN BATTLE

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No. 3:11-cr-72

CHIEF JUDGE HAYNES

*and the
true
resolution
were
granted
Rule 32
100%
3-1-14*

MOTION TO ACCEPT PLEA AND IMPOSE SENTENCE
OR
TO EXPEDITE SENTENCING HEARING

Comes now Chaswan Battle, by and through counsel, and respectfully asks this Honorable Court to accept his guilty plea tomorrow, and impose the agreed upon sentence, or, in the alternative, to expedite the sentencing hearing in this cause. In support of this motion, Mr. Battle would show the following:

1. The parties have reached a plea agreement, pursuant to Federal Rule of Criminal Procedure 11(c)(1)(C) to a "binding" term of 24 months incarceration. This is the middle of the government's suggested guideline sentence (and is somewhat above the guideline that defense counsel might argue for at a hypothetical contested sentencing hearing, absent this plea). However, under all the facts and circumstances, the parties have agreed that this is an imminently reasonable sentence (and the facts contained in the plea agreement should ratify that conclusion).
2. Mr. Battle has been in custody, as of tomorrow, for just over twenty (20)